There simply is no substitute now available for the functionality that N11 codes can provide today.

A. Existing Dialing Arrangements Do Not Meet the Same Needs as N11 Codes.

Some parties suggest that existing dialing arrangements could provide the same functionality as N11 codes. These parties, variously, suggest the use of 976 numbers, 900 numbers, 950-XXXX, 555-XXXX and regular seven digit numbers. As shown below, each of these proposals has significant shortcomings and none is capable of providing local abbreviated access to information services in the same way as N11 codes.

976 Numbers

Several parties suggest the use of 976 numbers, which are used for local pay-per-call services. See Comments of Ameritech at 6, Comments of U S West at 11-12. In fact, the limitations on 976 service make it an unsatisfactory replacement for N11 service. In the first place, and like all of the other currently-available proposed alternatives, 976 service does not provide abbreviated dialing. In most places, including in Texas where Southwestern Bell provides service to Cox's Austin newspaper, 976 service is restricted to pre-recorded messages, which makes it useless for truly interactive services like the one Cox proposes to offer.[23/] Use of 976 service also is geographically restricted.

23/ Similar restrictions apply in Florida and Georgia, other states where Cox has newspapers. For convenience of reference, the tariff provisions for 976 service referred to in this section are attached as Exhibit 2.

This limitation has prevented Cox from making use of Southern Bell's 976 tariff in Florida because 976 service is not available in the Palm Beach area. LECs also restrict 976 to pay-per-call services, which are not the only services that would use N11 codes. Finally, telephone companies, including U S West, are beginning to take steps to restrict the availability of 976 service.[24/] See Comments of Alternative Weekly Newspapers at 3. In other words, 976 service is no better, and typically less desirable, than regular telephone service which, as shown below, is not even close to being an adequate substitute for N11 service.

900 Numbers

The next pay-per-call alternative, 900 service, shares many of the drawbacks of 976 numbers and has difficulties of its own. Like 976, 900 service is intended only for pay-per-call services. More importantly, 900 service is designed for national, not local use, which increases the costs beyond a level that would be acceptable to local information services providers. A 900 number, which would require 10- or 11-digit dialing, is in fact the opposite of abbreviated dialing, which makes a 900 number clearly less desirable than N11 or even regular telephone service, especially in light of the costs.

24/ Telephone companies apparently are restricting the use of 976 because of a public perception that 976 services are unsavory. Even without the other deficiencies of 976, it is thus understandable why Cox and other information services providers would consider 976 service less desirable than N11.

950-XXXX

Some parties suggest the use of 950-XXXX as an alternative to N11 codes. See, e.g., Comments of American Telephone and Telegraph Company at 5. However, the limited supply of carrier identification codes, which are used to form 950-XXXX numbers, is already close to depleted. Moreover, the North American Numbering Plan Administration has noted its disapproval of the use of 950-XXXX for nationwide telephone numbers. See NANP Administrator's Proposal on the Future of Numbering in World Zone 1, § 4.6 (noting that 950 access was unlikely to be displaced, but expressing a belief that similar arrangements should not be implemented in the future).[25/] The use of 950 numbers also is not practical because there are restrictions on their use and because the costs of using them are high. Of course, 950 numbers also are designed for national rather than local use.

555-XXXX

PacTel and several other parties suggest that 555-XXXX could be made available for information services providers. See Comments of PacTel at 19. As a threshold matter, it is not at all clear that 555-XXXX could be implemented quickly. See Comments of U S West at 13 (describing issues that

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25/ Cox is not suggesting that the Commission should defer to the judgment of NANP Administration generally. It is significant, however, that NANP Administration has expressed disapproval of a practice that at least one BOC urges on the Commission in this proceeding. See Comments of U S West at 12. Among other things, this suggests that there is little reason to believe that the parties advocating 950 access as an alternative to N11 really intend for it to be used in that way.

would have to be resolved to implement 555-XXXX). At the same time, assignment of 555-XXXX codes for general use would be contrary to the North American Numbering Plan because 555-XXXX numbers are reserved for "services complementary to directory assistance." BOC Notes on the LEC Networks - 1990, § 3.3.2 ("Notes on the Network").[26/] It also is evident that commenters like PacTel view 555-XXXX as a way to provide national abbreviated dialing, which is not the actual or proposed use of N11 codes. In this context, it is evident that the proposal for 555-XXXX is more responsive to the needs of commenters like MCI than to the needs of local information services providers. See, e.g., Comments of MCI Telecommunications Corporation ("MCI") at 3 (proposing national assignments).

Seven-digit Numbers

Finally, some parties suggest that there is no reason to make N11 codes available because any information services provider can use a regular seven-digit number. Of course, if seven-digit numbers were that attractive all telephone companies would use them for directory assistance, repairs and business office calls, and they would not use or have any plans to use N11 codes for enhanced services. The fact is that seven-digit numbers are not as easy to remember or as convenient to use as the N11 codes and that N11 codes have

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26/ While Cox does not believe that the Commission is bound by Bellcore's description of the numbering plan, it is nevertheless telling that LECs that oppose use of N11 numbers as contrary to "basic" numbering principles are willing to ignore those same principles in their efforts to find alternatives to the Commission's N11 proposal.

distinct advantages over regular telephone numbers. Even proponents like U S West have difficulty providing any justification for using seven-digit numbers except that they exist and are available today. See Comments of U S West at 11. That is not a reason to conclude that they are an adequate substitute for N11 codes.

In sum, there are no currently-available dialing arrangements that provide meaningful alternatives to N11 codes. All of the proposed alternatives have significant drawbacks and none has the advantages that N11 codes provide.

B. Other Proposed Abbreviated Dialing Arrangements Will Not Be Available in the Foreseeable Future.

As shown above, the various suggestions for currently-available substitutes for N11 service are impractical. Moreover, non-N11 abbreviated dialing arrangements are not currently available. As the comments of many parties establish, arrangements like *XXX simply will not be available in the foreseeable future. Not only will the standards-setting process take several years to complete at best, but telephone company reluctance to implement new access arrangements and technical problems which prevent universal use of some arrangements make it clear that N11 is the only abbreviated dialing arrangement available in the near term.

The proposals for new forms of abbreviated access focus on * and # codes, including *XXX, #XXX and NXX#. Each of these dialing arrangements shares the basic flaw that it cannot be made available for several years at the very least. For instance, as NYNEX reports, the Industry Carriers

Compatibility Forum (the "ICCF") is only beginning to consider how to implement *XXX codes. Comments of NYNEX at 8. It may take two years or more for the ICCF to develop an industry consensus on how to implement *XXX codes. After that, local telephone companies must then put those arrangements into place, a process that requires writing software (or obtaining it from a switch vendor), debugging and testing before the service becomes available. Tariff approval also will be required.[27] In the end, it may well be four or five years before *XXX codes are available. Other arrangements, like #XXX or NXX#, have not even begun their journey through the standards-setting process, and it seems unlikely they will be available any sooner. While this schedule may seem lengthy, it is comparable to other industry standard-setting processes. Even under the prod of Commission deadlines, for instance, BOCs took more than 18 months after the Commission's initial order to submit their widely criticized Open Network Architecture plans,[28] and Bellcore's consideration of the future of the numbering plan, which began internally in 1990, is nowhere near completion as of this writing.

The wait for implementation of other abbreviated access arrangements also is likely to be lengthened by LEC disinterest in providing

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27/ This discussion assumes that the ICCF will determine that *XXX codes should be made available for abbreviated dialing. As discussed in Part III(B), supra, the telephone industry's treatment of *XX and the comments of NYNEX suggest that there will be resistance to using *XXX codes for anything but implementing LEC network features.

28/ See Filing and Review of Open Network Architecture Plans, 4 FCC Rcd 1, 10, 25 (1988) (describing timetable for submissions).

services that will be useful to competitors. As discussed in Section III(B), supra, there is little incentive for LECs to provide new services that will help others compete with unregulated LEC offerings. Thus, it is likely that the schedule described above is optimistic.

Even assuming they are implemented, many potential abbreviated dialing arrangements could not meet the needs that will be met by N11. As BellSouth and some commenters have acknowledged, for instance, numbers ending in # cannot be dialed from rotary telephones, which constitute approximately ten percent of the telephones in use today. Thus, it is entirely possible that a telephone industry effort to design abbreviated dialing standards would result in services that are not as useful as N11.

If the Commission is concerned that there may not be enough N11 codes, it could order LECs to assign N11 codes while engaging in an accelerated standards development process for *XXX or another form of abbreviated access. This would permit the immediate availability of abbreviated dialing while also providing the prospect of wider availability of other codes in the future. This approach not only provides immediate competition for LEC enhanced services, but will give those entering the market later an opportunity to obtain the numbers they want.

V. OTHER PROPOSED USES OF N11 CODES WOULD NOT BE IN THE PUBLIC INTEREST.

Some commenters suggest alternative uses of N11 codes, each claiming that its alternative is superior to local abbreviated dialing. A close

examination of these proposed alternative uses demonstrates that none of them would serve the public interest.

Almost all of the proposals share a single fault: There is no particular reason to use N11 codes for these purposes. At the same time, most of the proposals would take years to implement, by which time other approaches could easily be made available. In other words, there is no reason, let alone a compelling reason, to set aside N11 codes for any of the alternatives posed by commenters. Discussion of the individual proposals demonstrates why each fails to serve the public interest.

N11-XXXX and (N11) NXX-XXXX

Either of these proposals would take the N11 codes and use them as prefixes for longer numbers. Most commenters supporting these approaches suggest their use for nationwide access. Neither has any advantage over the existing 800, 900 and 950 services, which already are available for nationwide use. Neither meets the need for easy local access that the N11 proposal answers. These proposals also would require extensive changes to the nation's entire telephone network, would take years to develop and are contrary to the current provisions of the North American Numbering Plan. See Comments of Southwestern Bell at 1-4, citing Notes on the Network, § 3.2.4 (describing restrictions on use of N11 codes).

Area Codes

Some parties, fearing area code exhaust, argue that N11 codes should be reserved for use as area codes. See Comments of Bellcore at 6-7.[29/] Despite those expressed fears, there is no documented need for N11 codes as area codes, and the potential window when they might be needed is closing rapidly. First, N00 codes are better suited to be used as area codes, and five of them remain unused. Second, the availability of interchangeable NPAs on January 1, 1995 will end the current shortage of area codes, and review of Bellcore's recommended procedures and guidelines suggests that any request made between now and 1995 probably can be satisfied by an interchangeable NPA.[30/] Of course, even if N11 codes were used for area codes in one or two

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29/ Bellcore states that no decision has been made as to whether N11 codes or N00 codes will be used if there is an area code shortfall before the implementation of interchangeable NPAs in 1995. Comments of Bell Communications Research, Inc. ("Bellcore") at 6. This represents a change in position since March of this year, when a Bellcore representative informed Cox that there were no plans to use N11 codes for area codes. See Letter of Werner K. Hartenberger, Counsel for Cox Enterprises, Inc., to Hon. Alfred C. Sikes, Chairman, FCC, March 27, 1992, at 4, n.8.

30/ Any new area code requests likely can be satisfied with an interchangeable NPA because the process for assigning and implementing new area codes takes at least two years and is intended to put the new area code into place long before it actually is needed. Bellcore's suggested schedule calls for announcing a new area code two years before the split will occur and starting use of the new area code at least a year before numbers will run out. Any request for a new area code is submitted only after the area code boundaries are determined, which must be before the public announcement of the split and could be as long as four years before numbers will run out. While this information was obtained from draft guidelines for NPA splits that were provided to participants in Bellcore's NXX code assignment matter, and which were described as not being ready for publication, it appears to be consistent with actual practice. For instance, the 810

(continued...)

places, that would not preclude their local use elsewhere. See Comments of Cox at 32.

National Assignments of N11 Codes

National assignment of N11 codes, advocated chiefly by MCI, would be a waste of numbering resources because use of N11 codes would be limited to a handful of users, all of whom already have 10XXX access available to them. See Comments of MCI at 3. Local use, as proposed in the Notice, will permit many more information services providers to use N11 codes. Moreover, implementing national abbreviated dialing would take years because fundamental changes in switching arrangements would be necessary. By the time that national N11 codes could be implemented, other arrangements, like *XXX, could be made available for national assignments. National assignment of N11 codes, in sum, would be appropriate only for a particularly compelling need that could not be met by 10XXX or future dialing arrangements, and no such use has been suggested here.

30/ (...continued)
area code was requested on February 27, was assigned in late May or early June, and will be put into effect in Michigan during the second quarter of 1994, a span of two years and several months between the initial request and actual use of the code. PacTel reports that it is statutorily obligated to publicize area code splits two years before they occur. Comments of PacTel at 11. Similarly, the final stage of an area code split in Georgia has been delayed close to a year in order to consider proposed changes in the area covered by the new code, which demonstrates the flexibility built in to the process. Thus, it would be reasonable to begin assigning interchangeable NPAs in the very near future, which would eliminate the possibility of a near term area code shortage.

Information Service Gateway Codes

Use of N11 codes as information service gateways, advocated by Bell Atlantic and a few others, offers no meaningful advantage over individual seven-digit numbers for each information services provider. See Comments of Bell Atlantic at 2-5. Gateways make sense for computer services, where they can take the place of complex log-on sequences, but there is no comparable saving in telephone services. For voice services, a gateway would be no more convenient than dialing a seven digit number. In fact, dialing N11 and then an access code, as would be necessary, would be less convenient than a seven-digit number. Like most other suggestions, modifying telephone switches to handle a gateway would take a long time, much longer than will be necessary to implement N11 codes.

Use for Access to Presubscribed Information Services

Possibly the most unwieldy alternative proposal is the one made by the Ad Hoc Telecommunications Users Committee ("Ad Hoc"). Ad Hoc proposes to set aside N11 codes to be "assigned to a specific uniform function or type of service," with presubscription to particular providers by customers. Comments of Ad Hoc at 8-10. Ad Hoc provides no explanation of why anyone would find such an arrangement beneficial or of how it could be accomplished.[31/]

31/ Voice mail, Ad Hoc's own example of a service suited to its peculiar form of N11 access, demonstrates the extremely limited utility of this proposal. Voice mail subscribers often want to retrieve their messages from locations other than their own telephones; this is one of the chief reasons for subscribing to voice mail. N11 access, as proposed by Ad Hoc, would be completely useless from a pay telephone or from any other location not already presubscribed to the same voice mail provider.

Ad Hoc's glib invocation of the technical operation of 911 service to demonstrate the feasibility of its proposal ignores the clear geographic bounds on 911 routing, which would not apply to "presubscribed N11." Ad Hoc also fails to consider how BOCs would comply with their MFJ equal access obligations under the Ad Hoc proposal, since equal access affects enhanced services and interexchange access equally. See United States v. American Tel. and Tel. Co., 552 F.Supp. 131, 196 (D.D.C. 1982). Of course, the technical modifications necessary to turn Ad Hoc's proposal into reality would take years, even without considering the time necessary to develop technical standards.

Other "Public Interest" Uses of N11 Codes

A handful of commenters, notably PacTel and NYNEX, suggest that N11 codes should be reserved for other "public interest" uses. Comments of PacTel at 3, Comments of NYNEX at 3. While both PacTel and NYNEX attempt to suggest needs that require reserving N11 codes indefinitely, there is no demonstrated demand for any of these uses. In fact, PacTel's suggestion that 211 might be used for non-emergency police calls is not supported even by the editorial PacTel relies upon in its comments. See Comments of PacTel at Exhibit A (editorial stating that the best solution is for citizens not to call 911 except for emergencies). NYNEX's argument that separate numbers for fire, ambulance and police calls might be desirable, Comments of NYNEX at 3-4, is contrary to the long-term trend that unifies these emergency response systems in recognition of the fact that many calls require multiple services. It is particularly telling that

neither NYNEX nor PacTel can do anything more than suggest that reservations for additional services might be desirable. They certainly do not point to any significant support or public benefit for such new uses of N11 codes.

Telephone Company Uses of N11 Codes

Many LECs suggest that their own uses of N11 codes should take precedence over any other party's use. See, e.g., Comments of Anchorage Telephone Utility ("Anchorage Telephone") at 1-2. These LECs argue that their particular internal uses benefit the whole public, while third parties' uses of N11 codes would benefit what the LECs consider less valuable private uses. See, e.g., Comments of Centel at 2. As discussed above, this LEC delineation of the private and public interest is wholly without merit. See Part II(A), supra. LEC arguments about the "unique" value of their own uses of N11 codes are equally inaccurate.

For instance, several LECs report that they use N11 codes for internal network purposes. See, e.g., Comments of Anchorage Telephone at 1 (use of four N11 codes for testing); Comments of NYNEX at 6, n.7 (use of three N11 codes for "network-service related application[s]"). These LECs fail to explain why 958 and 959, the three-digit combinations set aside for such purposes under the North American Numbering Plan, are not suitable for these uses. See Notes on the Network, § 3.3.2. In reality, these and other internal uses for N11 codes that were revealed by LEC commenters are merely for convenience, and there is no special public interest benefit to the use of N11 codes instead of other

numbers.[32/] This is especially evident when one considers business office services, which some LECs provide via seven-digit numbers, others provide via 811 and some, including PRTC and Centel, split over two different N11 codes. Comments of PRTC at 2, Comments of Centel at 3, n.4. Obviously, different LECs have made different decisions, based not on the public interest but on their own convenience.

Finally, LEC complaints about being ousted from their current uses of N11 codes should be dismissed because they never have had any right to depend on the availability of those numbers. Notes on the Network, a document on which LECs seem to rely only when it is convenient, specifically states that the codes 211, 311, 511 and 711 should be used only "if their assignment and use can be discontinued on short notice." Notes on the Network, § 3.2.4. Thus, it is disingenuous at best for LECs to claim that they will be significantly harmed by giving up codes.[33/]

Saving N11 Codes for Future Uses

Finally, some commenters suggest reserving N11 codes for unspecified future uses. See Comments of Bellcore at 2. While assuring the

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32/ As discussed in Section III(B), supra, PRTC's list of uses of N11 codes is particularly revealing because it discloses PRTC's intent to use 711 for operator-assisted yellow pages, an enhanced service.

33/ In light of the use of 211, 311, 511 and 711 in some areas, Cox believes that the Commission would be justified in permitting a transition period of six months for LECs with pre-existing uses to transfer those uses to other numbers or codes. Any codes that are not in use in a particular area should not be subject to the transition period.

availability of numbering resources for future uses is wise, there is no need to "save" N11 codes for that purpose. Any future use for abbreviated dialing arrangements will come about only after extensive debate, which will allow sufficient time for the development of *XXX, NNX# or some other approach to abbreviated dialing. These other resources, which are not available today but could be in the future, represent additional ways to provide for as-yet-unknown uses for abbreviated dialing. In any event, it is difficult to justify reserving a resource with a known use for some other, unknown use that may some day arise.

Thus, each of the proposed alternative uses for N11 codes should be rejected. Critical review of the proposed alternative uses shows that none is superior to immediate assignment of N11 codes for local use. The parties proposing the alternatives fail to provide any meaningful justification for their proposals or to explain why the supposed need cannot be met as well by existing services. Even if they were desirable, many of the proposals could not be effected in the foreseeable future. Thus, there is no reason to abandon the Notice's conclusion that assignment of N11 codes for local use will serve the public interest.

VI. THE COMMISSION SHOULD REQUIRE FIRST-COME, FIRST-SERVED ASSIGNMENT FOR N11 CODES.

The Commission should specify the method for assigning N11 codes. As Cox demonstrated in its Comments, the Commission should expressly direct LECs to use first-come, first-served assignment. Doing so will prevent confusion

and delay, reduce the likelihood of litigation and help to assure assignment of N11 codes to parties with a genuine interest in providing N11 service.

Cox's analysis in its Comments focused on the legal issues surrounding possible assignment methods, and concluded that first-come, first-served assignment was the only method that would satisfy the Communications Act's mandate for reasonable, non-discriminatory provision of common carrier service. Comments of Cox at 11-19. This conclusion is consistent with the Commission's own determination in response to BellSouth's initial Request for Expedited Declaratory Ruling.[34/] Nothing contained in the other comments filed in this proceeding suggests any reason to doubt either Cox's reasoning or the Commission's own initial conclusion that first-come, first-served assignment is consistent with the public interest.[35/]

34/ See Letter from Robert L. Pettit, General Counsel, FCC, to David J. Markey, Vice President-Federal Regulatory, BellSouth Corporation (May 4, 1992) (the "Pettit Letter") (describing first-come, first-served as a reasonable and non-discriminatory method for assigning N11 codes). It is significant that, although other assignment methods (including a lottery) were suggested as appropriate, the Pettit Letter identified only first-come, first-served as a reasonable assignment method. The Notice endorsed the conclusions of the Pettit Letter. Notice, 7 FCC Rcd at 3004, n.1.

35/ ITAA expresses concern that first-come, first-served assignment might give LECs an opportunity to preempt the availability of N11 codes. Comments of ITAA at 5. If N11 codes are assigned according to the principles outlined in Cox's Comments, then this concern is mitigated because LEC use of N11 codes would be limited to the codes they already have. Even if LECs are permitted to apply for additional N11 codes, the one code per party limitation proposed in the Notice and generally approved by commenting parties would prevent them from usurping all N11 codes or a majority of them.

The importance of specifying a particular assignment method was reinforced by comments from LECs concerned that they could be challenged if they choose their own assignment methods. See, e.g., Comments of SNET at 5. Of course, litigation over individual LEC assignment methods would delay the provision of N11 service. Individual LEC decisions about assignment methods also could lead to a patchwork of different assignment mechanisms across the country, which would increase costs for potential N11 subscribers.

Specifying first-come, first-served assignment would solve these problems. Doing so would prevent LECs from being subject to unnecessary litigation about their assignment methods. First-come, first-served assignment also would be familiar to potential N11 subscribers, since it is the method used for all other current common carrier assignments, and has been approved in myriad other cases before this Commission and elsewhere. See Comments of Cox at 12-14. Thus, the Commission should specify that N11 codes are to be assigned on a first-come, first-served basis.[36/]

36/ Other concerns about assignment methods should be handled in similar fashion. For instance, Metropolitan Fiber Systems, Inc. ("MFS") expressed concern about how to define the area in which an N11 code is assigned and about coordination between two or more LECs that serve the same area. Comments of MFS at 5-6. Of course, these same LECs already have determined local calling areas for ratemaking purposes and have procedures in place for responding to requests for other numbering resources, including NXX codes. It would be appropriate to adopt those same procedures for assignment of N11 codes. Similarly, MFS's concern that it might not be able to offer its own N11 service even if it eventually offered switched service generally, id. at 6-7, is really only an element of the broader question of number portability, an issue that will not and should not be settled in this proceeding.

VII. CONCLUSION

This proceeding provides the Commission with an opportunity to make an underused numbering resource available to the information services industry. Unless the Commission takes this opportunity, LECs will have a monopoly on easy access to information services, to the detriment of all independent information services providers and of the public at large.

The record in this proceeding establishes that there is demand for N11 codes for information services and that assigning N11 codes will benefit information services providers and consumers generally. There is no reason to believe that assignment of N11 codes as proposed in the Notice will have any detrimental effects. If the Commission does not direct LECs to assign N11 codes to other parties, LECs will use N11 codes for enhanced and other unregulated services, increasing their ability to monopolize these markets.

The proposed alternatives to the use of N11 codes will not meet the need. Those that currently are available are not abbreviated at all, and most are not suited for local, interactive services. Other abbreviated dialing arrangements simply cannot be made available in the near future. Similarly, the proposed alternative uses of N11 codes are impractical. Even if they were desirable, they could not be implemented in the foreseeable future.

Finally, the Commission should recognize the importance of specifying how N11 codes are to be assigned by LECs. As Cox described in its Comments, first-come, first-served assignment, which was approved in the Pettit

Letter, is the best way to meet the Communications Act's mandate for reasonable, non-discriminatory provision of common carrier services.

Cox firmly believes that the public interest will be served by making N11 codes available to information services providers. The Commission should reject the self-interested pleas of the local telephone industry and look to the public interest which will be served by the availability and use of N11 codes for local service. For these reasons, Cox Enterprises, Inc. respectfully requests the Commission to adopt rules governing the assignment of N11 codes in the form described in Cox's Comments and herein.

Respectfully submitted,

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July 13, 1992

EXHIBIT 1

Assignments of *XX Codes

Revised May 5, 1992

VERTICAL SERVICES CODES (*XX) ASSIGNMENTS

CODE	SERVICE ASSIGNMENTS	
*0X	Reserved	
*1X	Reserved	
*2X	Reserved for expansion to a three digit numeric format (*2XX)	
*3X	Reserved for expansion to a three-digit numeric format (*3XX)	
*40	Unassigned	
*41	Unassigned	
*42	Unassigned	
*43	Unassigned	
*44	Unassigned	
*45	Unassigned	
*46	Unassigned	
*47	Unassigned	
*48	Unassigned	
*49	Unassigned	
*50	Unassigned	
*51	Who Called Me?	
*52	Single Line Variety Package (SVP) - Call Hold	
*53	Single Line Variety Package (SVP) - Distinctive Ring B	
*54	Single Line Variety Package (SVP) - Distinctive Ring C	
*55	Single Line Variety Package (SVP) - Distinctive Ring D	
*56	Change Forward-To Number for ISDN Call Forwarding	4/11/91
*57	Customer Originated Trace	
*58	ISDN MBKS Manual Exclusion Activation	4/11/91
*59	ISDN MBKS Manual Exclusion Deactivation	4/11/91
*60	Selective Call Rejection Activation	
*61	Distinctive Ringing/Call Waiting Activation	
*62	Selective Call Waiting	
*63	Selective Call Forwarding Activation	
*64	Selective Call Acceptance *Activation*	#C
*65	Calling Number Delivery	
*66	Automatic Callback Activation	
*67	Calling Number Delivery Blocking	
*68	Call Forwarding Busy Line/Don't Answer Activation	
*69	Automatic Recall Activation	

*70	Cancel Call Waiting	
*71	Usage Sensitive Three-way Calling	
*72	Call Forwarding Activation	
*73	Call Forwarding Deactivation	
*74	Speed Calling 8 - Change List	
*75	Speed Calling 30 - Change List	
*76	Advanced Call Waiting Deluxe	
*77	Anonymous Call Rejection Activation	10/30/91
*78	Do Not Disturb Activation	5/7/91
*79	Do Not Disturb Deactivation	5/7/91
*80	Selective Call Rejection Deactivation	
*81	Distinctive Ringing/Call Waiting Deactivation	
*82	Unassigned	
*83	Selective Call Forwarding Deactivation	
*84	Selective Call Acceptance Deactivation	#A
*85	Calling Number Delivery Deactivation	
*86	Automatic Callback Deactivation	
*87	Anonymous Call Rejection Deactivation	10/30/91
*88	Call Forwarding Busy Line/Don't Answer Deactivation	
*89	Automatic Recall Deactivation	
*90	Customer Programmable Call Forwarding Busy Line Activation	
*91	Customer Programmable Call Forwarding Busy Line Deactivation	
*92	Customer Programmable Call Forwarding Don't Answer Activation	
*93	Customer Programmable Call Forwarding Don't Answer Deactivation	
*94	Reserved For Local Assignment	
*95	Reserved For Local Assignment	
*96	Reserved For Local Assignment	
*97	Reserved For Local Assignment	
*98	Reserved For Local Assignment	
*99	Reserved For Local Assignment	

# = Changes in this issue.
A = Addition
D = Deletion
C = Change

EXHIBIT 2

Excerpts from Tariffs for 976 Service

Southwestern Bell Texas 976 Tariff

INFORMATION DELIVERY SERVICE

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